

April 11, 2002

John Serfass  
White Mountain National Forest  
WMNF Supervisor's Office  
719 Main Street  
Laconia, New Hampshire 03246

RE: Final Environmental Impact Statement for Loon Mountain Ski Resort Development and Expansion  
Project White Mountain National Forest, New Hampshire (EPA ERP No. AFS-B65009-NH)

Dear Mr. Serfass:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, we have reviewed the Forest Service's (FS) Final Environmental Impact Statement (FEIS) and Record of Decision (ROD) for the proposed development and expansion of the Loon Mountain Ski Resort on the White Mountain National Forest (WMNF) near the towns of Lincoln and Woodstock, New Hampshire.

The proposed project includes the construction of 124.2 acres of ski trail terrain (a net addition of 116.3 acres of trail); construction of 2 new chairlifts and upgrade/replacement of 5 others; expansion and upgrades to two existing up-mountain lodges; construction and upgrades to water pipelines and other snowmaking infrastructure (including water storage ponds) to serve 382 acres of ski trails. EPA has raised a number of concerns about the proposals to develop and expand Loon Mountain over the past sixteen years since the Loon Mountain Recreation Corporation (LMRC) first proposed such action. In response to our concerns, and those of others, the Forest Service has worked hard to improve the analysis and coordination associated with the NEPA review of the project, especially during the preparation of the most recent draft and final environmental impact statements. The project has also evolved in a number of ways since its inception to reduce impacts, including the current proposal which will result in the removal of snowmaking infrastructure that in the past allowed water for snowmaking to be withdrawn from Loon pond.

EPA's comments on the DEIS in April 2001 asked the FS to explore a number of issues more fully including: project purpose and need documentation; the lack of meaningful information about impacts from potential Phase II development; snowmaking targets; land use/secondary impacts; infrastructure; transportation; and air quality. Based on our review of the FEIS and ROD, we have several remaining comments and concerns about the analysis.

## **Land Use**

The FEIS largely dismisses EPA's concerns about potential growth impacts of the proposed expansion at Loon, responding that future growth rates are estimated based on past growth rates, which were low. Lacking other information, we cannot fully agree with this premise. EPA believes that the expansion will lead to secondary growth and land use changes that require mitigation. Our comments on the DEIS suggested that the FS and LMRC should make a commitment to help the host and surrounding communities deal with land use changes brought by the project through planning assistance or funds to help hire professional help. Our recommendations were dismissed and the only mitigation measure incorporated includes an annual status meeting among the LMRC, the Town of Lincoln, and NH DOT to resolve community issues and concerns. While this is a step in the right direction, it fails to include all of the affected communities and it appears as if the focus will be solely on the status of transportation projects, not the broader array of land use issues associated with the project. Lastly, the FEIS argues that these types of measures are outside FS jurisdiction. We do not agree, given that the impacts will flow from the FS's approval of the project and NEPA's requirement that the responsible federal agency undertake appropriate mitigation. EPA continues to believe that a greater level of commitment to mitigate for growth inducing impacts of the project is necessary and that mitigation measures could be developed in conjunction with affected communities and funded by the LMRC and FS.

EPA appreciates the FS recognition that activities beyond the Phase I development have the potential for significant impacts. According to the FEIS, future development proposals would be subject to subsequent NEPA analysis to evaluate effects and help the FS determine whether any expansion is warranted.

## **Hydrogeologic Issues**

The FEIS/ROD does an adequate job of describing the likely impacts of withdrawals from Connector Pond, North Pond and South Pond as well as explaining the need for a second drawdown test following construction of the 500-foot sheet-pile wall. However, the monitoring measures included in Section 4.2.3 (Table 4.52) for Connector Pond are vague and limited solely to the drawdown test. EPA requests the opportunity to review the pre-test scope of work and we reiterate the need for an operational monitoring program for the pond to verify that the wall, once installed, is working as designed well into the future to restrict leakage to 218gpm or less. EPA continues to believe that the North, South and Connector Ponds, if constructed, should be subject to careful design and mandatory inspection and maintenance to reduce the potential for damage as well as any adverse water-quality impacts due to extreme high water flows.

## **Air Quality**

Based on the microscale air quality analysis for carbon monoxide presented in the FEIS, the proposed

action will not result in exceedances of the National Ambient Air Quality Standards for one-hour or eight-hour carbon monoxide. While the proposed action will not adversely affect local air quality, EPA recommends that each of the identified air quality and transportation mitigation measures recommended in both the FEIS and ROD be implemented to the greatest extent possible to minimize potential air quality and traffic impacts. In particular, there are two measures contained in Table ROD - 4 “Recommended Mitigation Measures Under Other Agency/Entity Jurisdiction” of the ROD, that the FS should require the LMRC to implement:

- Expand the existing shuttle bus system between Loon Mountain Ski Resort and local lodging facilities to the extent possible (and when replacing or expanding the fleet, purchase advanced technology vehicles or cleaner diesel vehicles which include particulate filters); and
- Install retrofit pollution control equipment such as particulate filters, also known as particulate traps, on the exhaust system of diesel shuttle buses.

As mentioned above, future development on South Mountain as part of any Phase II plans will trigger additional environmental analysis under NEPA. We offer our assistance in defining the scope of work and air quality modeling/analyses required to quantify the predicted “significant air quality impacts” anticipated with increased traffic and construction associated with Phase II development. These impacts are likely to require their own mitigation measures.

EPA appreciates the opportunity to provide comments on the FEIS and to have participated as a member of the interagency team during the development of the DEIS/FEIS. Please feel free to contact me or Timothy Timmermann of EPA’s Office of Environmental Review at 617/918-1025 if you wish to discuss these comments further.

Sincerely,

Elizabeth A. Higgins  
Senior Policy Advisor  
Director, Office of Environmental Review

attachments  
cc:

Marty Abair, U.S. Army Corps of Engineers  
William Neidermyer, United States Fish and Wildlife Service